

ORIGINAL

November 5, 1997

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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re:)	
)	
Universal Service Generic Contested Case)	Docket No.
)	97-00888

**THE CITIZENS LECS' OBJECTION TO DISCOVERY REQUEST FILED
BY AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.**

Citizens Telecommunications Company of Tennessee, LLC and Citizens Telecommunications Company of the Volunteer State, (collectively referred to as the "Citizens LECS"), by their attorney, hereby object to the discovery request filed by AT&T Communications of the South Central States, Inc. ("AT&T"), and respectfully show as follows:

1. On October 30, 1997, ostensibly pursuant to the Phase 1 schedule, as revised October 17, 1997, AT&T served a set of ten interrogatories upon the Citizens LECS. The first nine interrogatories request data on revenues from different types of intrastate services and facilities and services; the tenth requests data on line counts associated with several intrastate services. Counsel for the Citizens LECS received the interrogatories at 3:00 p.m. on November 3, 1997, two days before responses were due.¹

2. The Phase 1 schedule in this proceeding is clearly labeled "Non-Cost Issues." The AT&T interrogatories do not address any issue identified in the Phase 1 schedule.² Accordingly, they are irrelevant to any issue in Phase 1.

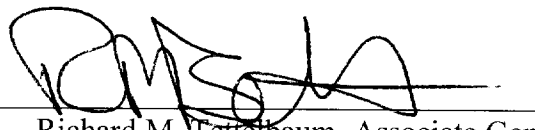
¹ Even if the AT&T interrogatories were not objectionable as irrelevant to any Phase 1 issue, the Citizens LECS would need two weeks, not two days, to respond.

² The Citizens LECS do not believe that the AT&T interrogatories are even relevant to any Phase 2 cost issues. They address revenues, not costs. Their relevance, if any, is in the generic access reform proceeding.

3. The Citizens LECs object to the AT&T interrogatories and request that they be relieved from providing an answer.

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS
COMPANY OF TENNESSEE, LLC
and
CITIZENS TELECOMMUNICATIONS
COMPANY OF THE VOLUNTEER STATE, LLC

By: 
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November 5, 1997

CERTIFICATE OF SERVICE

I, Richard M. Tettelbaum, hereby certify that a true and exact copy of the foregoing has been served on counsel of record and other interested parties via First Class Mail postage prepaid, this 31st day of November 1997.


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BEFORE THE TENNESSEE REGULATORY AUTHORITY**NASHVILLE, TENNESSEE****In Re:****Universal Service; Generic
Contested Case**)
)
)
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)**Docket No
97-00888**

STIPULATION OF THE PARTIES OF ISSUES TO BE BRIEFED

Comes now, AT&T Communications of the South Central States, Inc., BellSouth Cellular Corp., BellSouth Telecommunications, Inc., Ben Lomand Rural Telephone Cooperative, Citizens Local Exchange Carriers, Coalition of Small LECs and Cooperatives, Office of the Attorney General Consumer Advocate Division, DeKalb Telephone Cooperative, Inc., Electric Power Board of Chattanooga, GTE Mobilnet, MCI Telecommunications Corp., NEXTELINK Tennessee, North Central Telephone Cooperative, Time Warner Communications of the Mid-South, Twin Lakes Telephone Co., United Telephone-Southeast and Sprint Communications L.P., West Kentucky Rural Telephone Cooperative Corp., Yorkville Telephone Cooperative, the Tennessee Municipal Telecommunications Group, TCG MidSouth, Inc., and Tennessee Department of Environment, interested parties in this matter, and submit their statement of stipulation as to the issues requiring briefing in this matter before the Tennessee Regulatory Authority, as follows:

Stipulation: The above-named parties agree that issue numbers 2, 3, 4, 6, 10, 11, 12, 13, 14 and 15 do not require the presentation of oral testimony at hearing, and instead, necessitate briefing by counsel appearing before the Authority in this matter and / or the filing of pre-filed direct testimony.

The parties agreement to this stipulation is indicated by the signature of counsel:

AT&T Communications of the South
Central States, Inc.

BellSouth Cellular Corp.

BellSouth Telecommunications, Inc.

Ben Lomand Rural Telephone
Cooperative

Citizens Local Exchange Carriers

Coalition of Small LECs and
Cooperatives

Office of the Attorney General Consumer
Advocate Division

DeKalb Telephone Cooperative, Inc.

Electric Power Board of Chattanooga

GTE Mobilnet

MCI Telecommunications Corp.

NEXTLINK Tennessee

North Central Telephone Cooperative

Time Warner Communications of the
Mid-South

Twin Lakes Telephone Co

United Telephone-Southeast and
Sprint Communications L.P.

West Kentucky Rural Telephone Cooperative
Corp.

Yorkville Telephone Cooperative

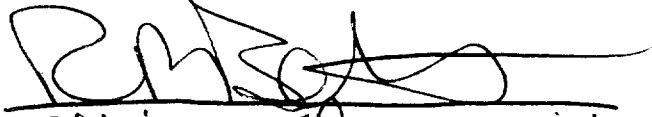
Tennessee Municipal Telecommunications
Group

TCG MidSouth, Inc.

Tennessee Department of Environment and
Conservation

Bledsoe Telephone Cooperative

Highland Telephone Cooperative, Inc.


Citizens Telecommunicator
Company of Tennessee, LLC +
Citizens Telecommunicator
Company of the Volunteer
State, LLC